

**BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, DC 20268-0001**

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY**

**Complaint on Sunday  
and Holiday Collections**

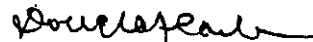
**Docket No. C2001-1**

**DOUGLAS F. CARLSON  
NOTICE OF FILING OF AMENDED PAGES OF COMPLAINT**

**March 26, 2001**

Pursuant to my motion for leave to amend my complaint,<sup>1</sup> I have attached amended pages 4 and 6 of my complaint.

Respectfully submitted,



Dated: March 26, 2001

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DOUGLAS F. CARLSON

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon the required parties in accordance with section 12 of the *Rules of Practice*.



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DOUGLAS F. CARLSON

March 26, 2001  
Santa Cruz, California

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<sup>1</sup> Douglas F. Carlson Motion for Leave to Amend Complaint, dated March 26, 2001.

19. In SCF Kalispell, Montana, customers did not receive outgoing First-Class Mail processing on Columbus Day, a non-widely-observed holiday, in 1999 and 2000. Correspondence concerning Columbus Day in 1999 appears in Exhibit 2.

20. On a nationwide or substantially nationwide basis, the Postal Service has eliminated processing of outgoing First-Class Mail on several holidays without first requesting an advisory opinion from the Commission on whether customers would receive adequate postal services, within the meaning of 39 U.S.C. § 3661(a), if they did not have access to outgoing First-Class Mail service on holidays or for two consecutive days. Current holiday service levels may not be adequate within the meaning of 39 U.S.C. § 3661(a).

21. Moreover, the Postal Service is not providing customers the level of holiday collection and outgoing First-Class Mail service that the POM prescribes.

#### **Christmas Eve and New Year's Eve Collections**

22. On the day prior to a holiday, the Postal Service must provide normal collection service. POM Exhibit 125.22.

23. If the holiday falls on a Saturday, the Postal Service must provide normal collection service on Friday. *Id.*

24. On Christmas Eve in 1999 — Friday, December 24, 1999 — post offices in several districts in at least two Postal Service areas, the New York Metro Area and the Northeast Area, conducted final collections on Christmas Eve prior to the final Friday collection time posted on collection boxes.

25. Post offices conducting early collections on Christmas Eve did not post a notice on each collection box warning customers that the posted Friday collection time did not apply. Therefore, mail deposited after the posted Friday collection time was not collected until Monday. Moreover, even customers who somehow learned about the early collections still were deprived of the proper level of

32. Early collections on Christmas Eve in some cities have occurred in years prior to 1999 as well.

33. On a nationwide or substantially nationwide basis, the Postal Service does not provide normal collection service on Christmas Eve and, possibly, New Year's Eve, despite a clear mandate in the POM to provide normal collection service on the day before a holiday.

34. The Postal Service has eliminated normal mail collections on Christmas Eve and, possibly, New Year's Eve without first requesting an advisory opinion from the Commission on whether customers would receive adequate postal services, within the meaning of 39 U.S.C. § 3661(a), if collections were curtailed on Christmas Eve or New Year's Eve and if collections were performed earlier than the time posted on collection boxes. Current service levels on Christmas Eve and, possibly, New Year's Eve may not be adequate within the meaning of 39 U.S.C. § 3661(a).

#### **CLASS OF PERSONS AFFECTED**

35. The Postal Service's failure to provide Sunday and holiday collection service in accordance with POM requirements affects nearly all postal customers nationwide.

36. Regardless of the level of publicity, if any, about curtailed collections, the Postal Service's failure to provide the proper level of collection service on Christmas Eve and, possibly, New Year's Eve affects millions of customers in at least two, and possibly more, Postal Service areas. This failure also affects any customer who may be visiting, travelling through, or otherwise present in an affected area.

#### **STATEMENT OF RELIEF REQUESTED**

37. Pursuant to 39 U.S.C. § 3662, I request that the Commission issue a public report documenting the Postal Service's failure to provide the POM-